NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES DIVISION OF ENVIRONMENTAL HEALTH ENVIRONMENTAL HEALTH SERVICES SECTION

September 21, 1999

MEMORANDUM

TO:

Virginia Ryan, R.S., Environmental Health Coordinator Chatham County Health Department

FROM: Larry D. Michael, R.S., Regional Environmental Health Specialist Children's Environmental Health Branch

THROUGH; Et Norman, M.P.H., Program Supervisor Children's Environmental Health Branch

No.

SUBJECT: Reuse of single-use containers for arts and crafts activities

The purpose of this memo is to provide an interpretation concerning the practice of utilizing styrofoam and cardboard egg cartons and styrofoam single-use meat/produce trays for use in arts and crafts activities by children.

In the Rules Governing the Sanitation of Child Care Centers, 15A NCAC 18A

.2809(a)(7) states that the reuse of single-service and single-use articles is prohibited. By definition, single-use containers (e.g., egg cartons, meat trays) are intended by the manufacturer to be used once and discarded. The intent of this rule is to prevent the reuse of such items as food contact surfaces. However, child care operators should be advised against other instances of reuse (e.g., arts and crafts) in which indirect disease transmission by substances and inanimate objects may occur. Any item once containing a potentially hazardous food has the potential to serve as a vehicle to transmit disease to children or other susceptible hosts. According to the United States Department of Agriculture, meat trays and egg cartons have been approved for a specific use and bacteria from foods that these packages once contained may remain on the packaging and contaminate food and hands¹.

Therefore, child care centers should be advised that reuse of such items is not recommended if used for children's arts and crafts activities. However, demerits should only be given when single-service and single-use articles are reused as food contact surfaces.

Thank you for your inquiry. Please contact me at (919) 718-0837 if you have any further questions regarding this matter.

cc: EHSS Standard Distribution List

¹United States Department of Agriculture (1998, May). Meat packaging materials [Online]. Available: http://www.fsis.usda.gov/oa/pubs/meatpack.htm